

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

_____)	
SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	
v.)	
)	Civil Action No. 21-cv-00260-PB
LBRY, INC.,)	
)	
Defendant.)	
_____)	

**PLAINTIFF'S MOTION FOR
ORDER TO PREVENT RULE 30(b)(6) DEPOSITION**

Pursuant to Fed. R. Civ. P. 26(c), plaintiff Securities and Exchange Commission moves for a protective order to prevent Defendants from taking a Rule 30(b)(6) deposition of the Commission on the noticed topics. In support of this motion, the Commission submits the accompanying memorandum.

Dated: February 22, 2022

Respectfully submitted,

**SECURITIES AND EXCHANGE
COMMISSION**

By its Attorneys,

/s/ Peter Moores
Marc Jones (Mass. Bar No. 645910)
Eric A. Forni (Mass. Bar No. 669685)
Peter B. Moores (Mass. Bar No. 658033)
Senior Enforcement Counsel
Boston Regional Office
33 Arch Street
Boston, MA 02110
(617) 573-4576 (Moores direct)
mooresp@sec.gov

CERTIFICATE OF SERVICE

I hereby certify that, on February 22, 2022, I caused true and correct copies of the foregoing to be served on counsel of record for all parties that have appeared to date through the Court's CM/ECF system.

/s/ Peter Moores

Peter Moores